



COMMONWEALTH of VIRGINIA
Office of the Attorney General

202 North Ninth Street
Richmond, Virginia 23219
804-786-2071
FAX 804-786-1991
Virginia Relay Services
800-828-1120

Mark R. Herring
Attorney General

MEMORANDUM

TO: William L. Harp, MD
Executive Director
Virginia Board of Medicine

FROM: Erin L. Barrett
Assistant Attorney General

DATE: July 14, 2017

SUBJECT: *Regulations Governing the Licensure of Occupational Therapists*
18VAC85-80-10 *et seq.*

I have reviewed the amendments to the *Regulations Governing the Licensure of Occupational Therapists*, 18VAC85-80-10, *et seq.* The proposed amendments change the title of the chapter to the *Regulations Governing the Practice of Occupational Therapy*, eliminate the requirement that the Board audit 2% of licensees, and remove the requirement that licensees fill out and maintain Continued Competency Activity and Assessment Forms. The Board of Medicine has the statutory authority to amend this regulation under Virginia Code §§ 54.1-2400 and 54.1-2912.1. The proposed amendments are constitutional and do not conflict with existing federal or state laws or regulations.